

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

MARK S. SCOTT,

Defendant.

No. 17 Cr. 630 (ER)

**NOTICE OF MOTION IN SUPPORT OF
DEFENSE MOTIONS *IN LIMINE***

PLEASE TAKE NOTICE THAT, for the reasons set forth in the accompanying memorandum of law, the defendant, Mark. S. Scott, will move this Court before the Honorable Edgardo Ramos, United States District Court, Southern District of New York, at a time to be determined by the Court, for an order granting the following motions *in limine*:

1. The Government should not be permitted to refer to OneCoin investors as “victims.”
2. The Government should not be permitted to introduce evidence as to the particular amount of money an individual invested in OneCoin or any resulting hardship.
3. The Government should not be permitted to call a witness who decided *not* to invest in OneCoin.
4. The Government should not be permitted to introduce evidence with respect to how Mr. Scott used fees he received from the Fenero Funds.
5. The Government should not be permitted to call a money laundering expert.

/s/ Arlo Devlin-Brown

Arlo Devlin-Brown
COVINGTON & BURLING LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
(212) 841-1046

David M. Garvin
Law Offices of David M. Garvin, P.A.
200 South Biscayne Boulevard
Suite 3150
Miami, FL 33131
(305) 371-8101

Counsel for Mr. Scott